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April 15, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza
Courtroom 820
Central Islip, NY 11722

Re: Rivas v. Ariel Auto Collision Corp., et ano.
Case No.: 2:23-cv-5371 (NJC) (SIL)

Dear Judge Locke:

This firm represents the Defendants in the above-referenced case, who respectfully submit this letter motion to request a seven (7) day extension of time to submit the parties' anticipated joint letter motion for settlement approval.

Consistent with the Individual Motion Practices, Defendants respectfully submit that: (i) the reason for the request is to permit your undersigned the time necessary to have Defendants execute the parties' settlement agreement; (ii) there have been at least three (3) previous requests for an extension of time of this deadline; (iv) these requests were granted; and (v) the adversary consents to and joins in the request for an extension.

Defendants recognize that this Court stated the previous request was the final extension. Regrettably, due to deadlines and appearances in other matters, your undersigned was unable to meet with Defendants to execute the settlement agreement. Defendants respectfully submit that based on the foregoing, there exists sufficient good cause and excusable neglect for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B). Defendants thank this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
April 15, 2025

Respectfully submitted,
SAGE LEGAL LLC
By: /s/ Emanuel Kataev, Esq.
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